

REMARKS

The Examiner is thanked for the careful review of the application as set forth in the outstanding office action. Reconsideration of the application in view of the foregoing amendments and the following discussion is respectfully requested.

Allowable Subject Matter

Claims 5-8, 14-16, 19, 20, 22, 27 and 30-32 have been allowed.

The status of Claim 33 is not addressed in the outstanding office action. Applicants respectfully submit that Claim 33 is also allowable, since it depends from allowable Claim 32.

Claims Rejections - 35 USC 102

Claims 9 and 21 stand rejected as being anticipated by Garcia et al. ("Garcia"), U.S. 6,042,216. This rejection is respectfully traversed on the ground that a prima facie case of anticipation has not been established, and the reference does not describe each element of Claims 9 and 21.

The rejection does not address all features of the rejected claims, and thus fails to establish a prima facie case of anticipation. Moreover, applicants respectfully disagree with the Examiner's recitation of the teachings of Garcia.

1. The Examiner reads wiper 234 or capper 236 as corresponding to a first service module.

2. The Examiner asserts that Garcia discloses "identifying a printhead-related service condition (Abstract, lines 3-6) not adequately addressed by servicing the printer with the first service module being in an un-worn condition (complete servicing includes other service module such as a capper, a spittoon and a primer connection. Abstract, lines 6-8)."

3. The Examiner further asserts that Garcia discloses "providing a second service module (capper 236 or wiper 234) with a service function different from the first service module (Fig. 14a) and adapted to address said printhead-related service condition, the second service module removably installable on the printer and with respect to the first service module (Fig. 23)." Applicants respectfully disagree with this interpretation of Garcia. FIG. 23 is an exploded isometric view of the service station module of FIGS. 14A-14B; there is no teaching or description that a wiper 234 is removably installable with respect to a capper 236. Just because the elements of the service module of FIGS. 14A-14B are shown in an exploded view to show details of the service module does not support the Examiner's assertion that elements 234 or 236 are intended to be removably installable with respect to the service module or the other elements.

4. The Examiner further asserts Garcia discloses "providing the second service module to the printer user (234, 236 is available for use, Fig. 23), wherein the step of providing a set of instructions includes providing a set of human-readable instructions for using the second service module (column 6, line 61 - column 7, line 7, column 8 line 7-18) provide human-readable instructions on how to use the second service module 234, 236)." These assertions do not meet the claim limitations. There is no showing that the alleged instructions are provided to the printer user, i.e. that the Garcia document is provided to the printer user. Moreover, there is no description of how the user can or should use a "module" 234 or 236.

Applicants respectfully submit that Garcia does not describe the following limitations of Claims 9 and 21:

identifying a printhead-related service condition not adequately addressed by servicing the printer with the first service module being in an un-worn condition

providing a second service module with a service function different from the first service module and adapted to address said printhead-related service condition, the second service module removably installable on the printer and with respect to the first service module

providing a set of instructions for using the second service module with the inkjet printer to the printer user, wherein the step of providing a set of instructions includes providing a set of human-readable instructions for using the second service module

(Claim 9)

identifying a printhead-related service condition not adequately addressed by servicing the printer with the first service module being in an un-worn condition

providing a second service module with a service function different from the first service module and adapted to address said printhead-related service condition, the second service module removably installable on the printer and with respect to the first service module

providing a set of instructions for using the second service module with the inkjet printer to the printer user, wherein the step of providing a set of instructions includes providing a set of human-readable instructions for using the second service module

(Claim 21)

The rejection under Section 102 should be withdrawn.

Claims Rejections - 35 USC 103

Claims 12 and 25 stand rejected as being unpatentable over Garcia in view of Wojcik (U.S. 6,250,736). This rejection is respectfully traversed on the grounds that a prima facie case of obviousness has not been established, and the references do not teach or suggest the invention of these claims.

Claim 12 is drawn to a method for servicing an inkjet printer including an inkjet printhead with a nozzle plate and a first service module removably installed on the printer, comprising:

identifying a printhead-related service condition not adequately addressed by servicing the printer with the first service module being in an un-worn condition;

providing a second service module with a service function different from the first service module and adapted to address said printhead-related service condition, the second service module removably installable on the printer and with respect to the first service module, wherein said printhead-related service condition includes ink accumulation on the nozzle plate, and wherein the second service module includes a wiper fabricated of silicon, or a textile, or a special rubber for removing the ink accumulation.

Garcia has been addressed above, and does not address the problem of a printhead-related service condition not adequately addressed by servicing the first service module being in an un-worn condition. Garcia teaches replacing the service with a fresh service module at the same time that the associated printhead is removed. 8:61 to 9:4. Moreover, there is no teaching of providing a second service module with a service function different from the first service module that is removably installable on the printer and with respect to the first service module.

Wojcik is cited only for its disclosure of a wiper of silicon or rubber, and does not supply any missing teachings discussed above regarding Garcia.

The references fail to teach or suggest all claim limitations of Claim 12. The rejection should be withdrawn.

Similar considerations apply to Claim 25, drawn to a method for servicing an inkjet printer including an inkjet printhead and a removable first service module, comprising:

providing a second service module different from the first service module and adapted to address a printhead-related service condition not adequately addressed by the first service module being in an un-worn condition, the second service module removably installable on the printer and with respect to the first service module;

installing the second service module in the printer;

conducting a printhead-related service operation using the second service module;

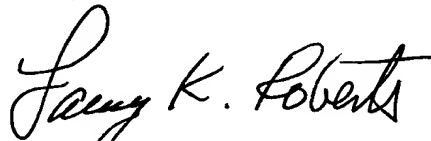
wherein said printhead-related service condition includes ink accumulation on a printhead nozzle plate, and wherein the second service module includes a wiper fabricated of silicon, or a textile, or a special rubber for removing the ink accumulation.

Because the applied references do not teach or suggest all claim limitations, the rejection of Claim 25 should be withdrawn.

CONCLUSION

All outstanding rejections have been addressed, and the application is in condition for allowance. Such favorable reconsideration is solicited.

Respectfully submitted,



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